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April 20, 2016

Captain Derrick Peterson
Multnomah County Detention Center
11540 NE Inverness Drive
Portland, OR 97220

Multnomah County Attorney
501 SE Hawthorne Boulevard, Suite 500,
Portland, Oregon 97214

4 pages sent by fax to 503-988-3377

Re: Inmate: Ammon Edward Bundy – ID #795069 – Inmate Rights

Dear Captain Peterson:

I am writing you this in advance of Ammon's return to Oregon. While you and your team have generally been very responsive to our concerns, Ammon and I had a very poor experience with his jail in Nevada that set us back in our case. I am writing to be proactive with our concerns, as I am determined to keep this case on track for a September trial date.

This letter serves as Mr. Bundy's request for resources for his ability to adequately defend himself in his federal cases in the manner outlined below. Also, I write to confirm in advance that Mr. Bundy will immediately be returned to general population and not have to go through another two weeks of solitary confinement as he initially did in Oregon and then inhumanely did for several days in Nevada (<http://snip.ly/solitary-nevada>). It is our position that any additional administrative segregation of Mr. Bundy in Oregon would be a violation of 42 U.S.C. § 1983.

We are also requesting that Mr. Bundy be allowed access to a computer to type notes regarding his case and to review the complex volumes of electronic discovery. As you may know, the court has declared this case complex. Therefore, we would like him to have all avenues available to assist in defending this complex case. There are thousands and thousands of pages of discovery and many hours of video footage in both cases. It would be an unfair and arbitrary financial burden to require Mr. Bundy to only review e-discovery with an investigator present. Because of the complex nature of this case, Mr. Bundy also needs to make electronic notes so he can effectively distill and reference the massive amount of discovery in this matter, and then use those notes to consult with counsel and prepare a constitutionally adequate defense with his legal team.

If this request is not allowed, we request a hearing regarding this matter and reserve the right to bring this to the court's attention and/or file a section 1983 lawsuit.

Although I only represent Mr. Ammon Bundy, it is my client's position that a rising tide lifts all ships, and he believes it to be in his best interests if all of the defendants had the same technology and resources available to them that the United States Government has. Rest assured, the US Attorney and FBI case agents are not writing notes with a stubby pen and getting callouses on their fingers in the process. Therefore in addition to the above-mentioned items, please provide all defendants with the following items:

- a. General office supplies, including paper, pens, pencils, and file folders.
- b. Storage and working space in his cell for books and legal materials.
- c. A chair and table for writing (it is our understanding that Ryan Bundy was punished for using extra towels to place under his knees to allow him to write and pray after having a disagreement with a chaplain over Mormonism's place in the church of Christ).
- d. Access to a law library and legal research materials, including access to online research. It is important for the defendants to be able to scour the internet for exculpatory information given the unique public nature of their cases.
- e. A computer suitable for and capable of legal research and drafting of legal pleadings. Such computer should be equipped with and have the following specifications:
 1. Accessible only to the inmate in his cell, allowing him to work twenty-four hours per day and seven days per week.
 2. Cordless printer and scanner.
 3. The software necessary to review the discovery.
 4. Software necessary to review and edit pleadings and other documents, including MS Word, Adobe Acrobat X, Microsoft Movie Editor, and PowerPoint.
 5. Media cards and external hard drives for reviewing resources electronically (which can be provided by counsel) and saving files to be reviewed by counsel; and
 6. Means for access to electronic legal resources such as Google, LexisNexis, etc.
- f. Access to news sources related to his cases, including the ability to set up relevant Google alerts and read related stories in nearly real time.
- g. Ability to contact all attorneys (as permitted by me) by phone or in person without surveillance, including but not limited to Ken Medenbach and Ryan Bundy.

Given the complexities of this case and Mr. Bundy's right a speedy trial, he is an essential part of his legal team. He has the ability and the right to

represent himself in this limited capacity to assist with his own defense under the Sixth Amendment without waiving his right to counsel under Faretta v. California, 422 U.S. 806 (1975).

It is my professional opinion that Ammon Bundy cannot adequately be defended without access to these materials given the timelines guaranteed for speedy trial and the slow production of voluminous discovery. It's a matter of fundamental fairness. Of course, he may be willing to stipulate to the current situation, if the FBI and US Attorney's Office agreed to only use a tiny pencil and paper for the remainder of the case.

It is also important to note that enemy combatants were even allowed to use laptop computers at Gitmo as reported by the Washington Times in 2010: <http://snip.ly/gitmo>.

First Amendment Exercise of Religion

Additionally, it has come to my attention that one of the chaplains at the jail may be hostile to the LDS faith in violation of the First Amendment. Please counsel that individual to be open to all faiths, and also please permit the LDS members to congregate together to discuss scripture and pray. In particular, we are formally requesting that Ammon and Ryan Bundy be allowed to practice their religion together in addition to working on their cases together.

Eighth Amendment Inmate Treatment

Finally, please provide Mr. Bundy with reasonable access to exercise and daylight, as well as personal contact with his family in a contact room, supervised by jail staff, of course. It appears that he is arbitrarily confined to the downtown facility although he more than likely qualifies for Inverness under your own department's policies. **Please consider this notice of an administrative hearing regarding placement.**

Public Records Request and Spoliation Notice

This letter also serves as a public records request and request to preserve records. Please provide our office with the following:

Any record of communication, including but not limited to email, phone calls, any official correspondence, or internal memorandum, between your agency and any member of the Henderson Police Department, or the Henderson Detention Center; with the US Marshals Service; with the United States Attorney's Office; any other government agency, or anyone else involved regarding Mr. Bundy or Mr. Bundy's case.

If there are any copying charges associated with this request, please contact

our office, and we will promptly remit payment. If the estimate of charges is more than \$65.00, please contact our office before continuing. If there are any questions regarding this request, please contact our office. Thank you in advance for your efforts.

Sincerely,

/s/ Mike Arnold

Michael Arnold
mike@arnoldlawfirm.com

cc: Client
Dan Hill
Ryan Bundy via Lisa Ludwig